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ORAL ARGUMENT REQUESTED

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UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

Case No. 22-19361-MBK

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In Re:

Chapter 11

BLOCKFI INC., *et al.*,

**NOTICE OF CROSS-MOTION**

(Jointly Administered under a Confirmed Plan)

Debtors.

**Hearing Date: August 27, 2024 at 11:30 a.m.**

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PLEASE TAKE NOTICE, that upon the within application, including the Affirmation of Andrew Marks, Esq. and exhibits thereto, the bankruptcy court's docket, and all pleadings and proceedings heretofore filed and had herein, the creditor Matthew Gordon (the "Cross-Movant"), by his attorneys Dorf Nelson & Zauderer LLP, will cross-move this court, **Via Zoom**, before the Honorable Michael B. Kaplan, United States Bankruptcy Judge in the United States Bankruptcy Court for the District of New Jersey at the Clarkson S. Fisher U.S. Courthouse, located at 402 East State Street, Trenton, New Jersey 08608, in Courtroom No. 8, on **August 27, 2024 at 11:30 a.m. ET**, (the "Hearing Date") or as soon thereafter as counsel may be heard for an Order, directing BlockFi Inc. and its debtor affiliates (collectively, "BlockFi" or the "Wind-Down Debtors"), to immediately pay Matthew Gordon the amounts owed under his approved claims pursuant to the Amended Chapter 11 Plan and Confirmation Order dated October 3, 2023; and

granting Matthew Gordon such additional and further relief as this court deems just, proper and equitable.

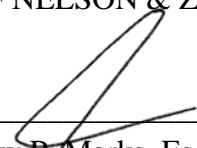
**PLEASE TAKE FURTHER NOTICE**, that Matthew Gordon will be relying on this cross-motion including the affirmation of Andrew Marks, Esq., and that no brief is being filed since the legal basis upon which the relief should be granted is set forth in the motion.

**PLEASE TAKE FURTHER NOTICE**, that in accordance with D.N.J. LBR 9013-(a)(3) any objections or opposition must be filed with the Clerk of the United States Bankruptcy Court, 50 Walnut Street, 3<sup>rd</sup> Floor, Courtroom 3A, Newark, New Jersey 07102, and served upon Dorf Nelson & Zauderer LLP, Attn: Andrew Marks, Esq., 555 Theodore Fremd Avenue, Rye, New York 10580, **so they are received no later than four (4) days before the Hearing Date set forth above.**

**PLEASE TAKE FURTHER NOTICE**, that in the absence of any objections, the relief requested in the Cross-Motion may be granted without further notice.

Dated: Rye, New York  
August 20, 2024

DORF NELSON & ZAUDERER LLP

By:   
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